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May 21, 2020

VIA ELECTRONIC FILING

Hon. Karen Spencer Marston
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: McCowan et al., v. City of Philadelphia, et al.
2:19-cv-03326

Dear Judge Marston:

This office represents the interests of Defendant Richard Ross Jr. in the above-referenced action. Please accept this correspondence on behalf of counsel for all defendants in this matter as a request for a telephonic conference with the Court.

On May 15, 2020, Your Honor ordered the parties to conduct a meet and confer before May 22, 2020. We held a virtual meet and confer today via Zoom and counsel for all parties attended. However, the conference was not productive.

I drafted an agenda and attempted to focus all counsel on the standard issues discussed at a meet and confer. Specifically, the agenda covered: Plaintiffs' Requests for Admission, Defendant Ross' offer to stipulate to certain facts, depositions, a proposed confidentiality agreement, a clawback agreement between counsel, and a Stipulated Electronic Discovery Protocol. With the exception of agreeing to review the e-discovery protocols, Plaintiffs' counsel refused to participate in good faith negotiations on any of the aforementioned topics and noted that he "will not agree to anything." Thereafter, our conversation concluded.

We respectfully request that the Court schedule a conference to guide counsel as we have reached an impasse.

Thank you in advance for your courtesies in this regard.

Respectfully submitted,

s/Lloyd Freeman

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Salutation

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cc: All counsel of record (via ECF)

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